



COMMONWEALTH OF PENNSYLVANIA

October 10, 2025

E-FILED

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. City of Lancaster – Bureau of Water
/ Docket No. R-2025-3057237**

Dear Secretary Homsher:

Enclosed please find the Complaint, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Jason Hails
Roger Cathcart
Parties of Record

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. This Complaint is filed against the rates, terms, and other provisions of the September 30, 2025, filing by the City of Lancaster (“Lancaster”) in support of Supplement No. 49 to Tariff No. 6 (“Tariff”) with a general rate increase within the meaning of 66 Pa. C.S.A § 1308(d) and pursuant to 52 Pa. Code § 53.45(a), with the Pennsylvania Public Utility Commission (“Commission”).

6. Lancaster serves 14,960 residential accounts and 1,864 commercial accounts inside the City. Outside of the City, it serves 29,663 residential accounts and 1,892 commercial accounts.

7. The proposed tariff supplement, if approved by the Commission, would Create an overall rate increase of \$7,005,217 per year or by 30.9%. A bill for a residential customer with a 5/8-inch meter, using 4,500 gallons per month would increase from \$29.53 to \$38.32 per month or by 29.8%. The total bill for a commercial customer with a 2-inch meter using 73,100 gallons per month would increase from \$361.75 to \$460.14 per month or by 27.2%.

8. Complainant believes, and therefore avers that this Tariff materials may be insufficient to justify the rate increase requested, and that Lancaster’s present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to small business customers.

9. Complainant believes, and therefore avers, that the Company’s present and proposed rates, rate design and cost and revenue allocation are or may be unjust, unreasonable, and unlawfully discriminatory in violation of, *inter alia*, Sections 1301 and 1304 of the Public

Utility Code, 66 Pa. C.S. §§1301 and 1304, and contrary to appropriate public policy and sound ratemaking considerations and may not be supported by the materials filed by Lancaster.

WHEREFORE, in view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. Suspend and investigate proposed Supplement No. 49;
- B. At the conclusion of said investigation, reject the proposed new rates and other tariff changes in Supplement No. 49 to the extent required to ensure that Lancaster's rates are lawful, just, reasonable, and not unduly discriminatory to any class of customers, including small business consumers; and
- C. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

For:
NazAarah Sabree
Small Business Advocate

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

DATE: October 10, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2025-3057237
v.	:	
	:	
City of Lancaster – Bureau of Water	:	

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention in the above-captioned Commission proceeding.

On September 30, 2025, City of Lancaster (“Lancaster”) filed materials in support of Supplement No. 49 to Tariff No. 6 with a general rate increase within the meaning of 66 Pa. C.S.A § 1308(d) and pursuant to 52 Pa. Code § 53.45(a), with the Pennsylvania Public Utility Commission (“Commission”).

The Small Business Advocate is intervening in this proceeding to protect the interests of the Lancaster’s small business customers. A thorough inquiry by the

Commission into all elements of this filing is necessary to ascertain whether its proposal conforms to the Public Utility Code and to the Commission's regulations.

In view of the foregoing, the Small Business Advocate is requesting that the Application be subject to investigation before the Commission. The Small Business Advocate will ask the Commission to deny or modify any aspect of Lancaster's proposal that is not proven to be just, reasonable, non-discriminatory, and fully in accordance with the Public Utility Code and the Commission's regulations regarding rate increases.

Dated: October 10, 2025

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: October 10, 2025



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2025-3057237
v.	:	
	:	
City of Lancaster – Bureau of Water	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey, Jr.
Chief Administrative Law Judge
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1500 Market Street,
Centre Square West, 38th Floor
Philadelphia, PA 19102
Courtney.schultz@saul.com

Date: October 10, 2025

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399